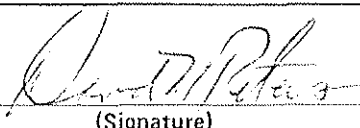
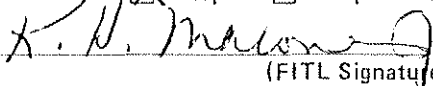


<b>1. COST CENTER</b> EP152-6	<b>TECHNICAL DIRECTION DOCUMENT (TDD)</b> <b>UNCONTROLLED HAZARDOUS WASTE SITE PROJECT</b> <b>ecology and environment, inc.</b>		<b>2.</b> No. F-6-8203-7
<b>3. Priority:</b> <input checked="" type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	<b>4. Authorized Overtime</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>5. EPA Site Identification Number</b> _____	<b>6. Completion Date:</b> 4-12-82
<b>7. Reference Info:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Attached <input type="checkbox"/> Pick Up			
<b>8. General Task Description:</b> Requisition a forklift, operator, & 3 drum handlers to assist in a sampling operation at Monochem, Goismar, LA			
<b>9. Specific Elements:</b> Forklift, operator & drum handlers must be available April 7, 8 & 9 In addition, FIT will be responsible for providing a plastic sheet & absorbent material for spill containment & a 55 gallon drum (see attached memo)		<b>10. Interim Deadlines</b> _____ _____ _____ _____ _____ _____ _____ _____	
<b>11. Desired Report Form:</b> Formal Report <input type="checkbox"/> Letter Report <input checked="" type="checkbox"/> Formal Briefing <input type="checkbox"/> Other (Specify): _____			
<b>12. COMMENTS:</b> _____ _____ _____			
<b>13. Authorizing DPO:</b> <div style="text-align: center;">           (Signature)       </div>		<b>14. Date:</b> 3/9/82	
<b>15. Received By:</b> <input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Accepted with exceptions <input type="checkbox"/> Rejected <div style="text-align: center;">           (FITL Signature)       </div>		<b>16. Date:</b> 3/9/82	

Exceptions Comments From (15)



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: 05 MAR 1982

SUBJECT: Tasking FIT to aid EPA in drum staging, Geismar, Louisiana, April 7-9, 1982

FROM: Will Focht *Will*  
Environmental Engineer, 6AW-HTTO: Dave Peters  
Chief, Hazardous Waste Section, 6ES-SH

*on April 7-9, 1982*

EPA, Region 6 in conjunction with the Justice Department and the Department of Transportation, is actively involved in a criminal investigation involving the illegal transport and storage of drums containing hazardous waste. These drums are currently under Grand Jury subpoena and are stored at the generator's facility in Geismar, Louisiana. The Grand Jury and the U. S. Attorney prosecuting the case have requested that further sampling and drum testing be conducted. In accordance with this request, we have arranged to have NEIC Denver perform sampling and analysis of drum contents of 15-20 drums. However, we may also need personnel to move drums around, transfer drum contents, procure and operate a forklift, and clean up any spills that may result.

The drums contain a spent 90% activated carbon/10% mercuric chloride catalyst. The concentration of mercury is less than 5% and averages about 50 ppm. In one or two of the drums, total chromium may exceed the 5 mg/l EP Toxic limit. The wastes are not expected to be corrosive. For the most part, the wastes are in a solid form, but some liquids may be in the drums due to rainfall accumulation. The spent catalyst will be contained in plastic bags, which are inside of 55 gallon drums (often badly deteriorated), which are in turn inside of new 85 gallon overpack drums.

## Personnel Required:

1 Forklift Operator - <sup>3</sup>2 days (*April 7 & 8 & 9*)  
3 Drum Handlers - <sup>3</sup>2 days

## Equipment Required:

1 Forklift large enough to reach 3 stacks high  
1 55 gallon drum in good condition  
1 Spill Blanket - at least 10' x 10' - or other similar spill containment device.  
Other suitable spill cleanup materials and equipment  
Standard Safety Equipment - gloves, boots, coveralls, plastic suits, respirators

No samples will need to be taken by FIT personnel. Also, 6 FIT members are already familiar with these drums and contents as a result of the drum inventory taken in Hidalgo, Texas on April 24 - May 2, 1981. K. Malone, FIT leader, was also present during a portion of the inventory.

*Confirm need on or about 3/25*